

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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|                          |   |                   |
|--------------------------|---|-------------------|
| WAYMO LLC,               | ) |                   |
|                          | ) |                   |
| Plaintiff,               | ) |                   |
|                          | ) |                   |
| vs.                      | ) | Case No.          |
|                          | ) | 3:17-cv-00939-WHA |
| UBER TECHNOLOGIES, INC., | ) |                   |
| OTTOMOTTO LLC; OTTO      | ) |                   |
| TRUCKING LLC,            | ) |                   |
|                          | ) |                   |
| Defendants.              | ) |                   |

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VIDEOTAPED DEPOSITION OF LIOR RON

San Francisco, California

Monday, June 19, 2017

Volume I

Reported by:

SUZANNE F. GUDELJ

CSR No. 5111

Job No. 2641996

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1 BY MR. PERLSON:

2 Q Did you do anything beyond that in  
3 enforcing the policy, other than having people  
4 acknowledge that it exists and that they agreed to  
5 it?

09:50:06

6 A I've helped basically make sure that nobody  
7 is using personal laptops by issuing new laptops as  
8 they join Otto.

9 Q Anything else?

10 A Not that I can recall right now.

09:50:19

11 Q Did Mr. Levandowski have an Otto-issued  
12 laptop?

13 A I believe he had.

14 Q How would we figure that out?

15 A I'm -- I'm not sure how to figure it out.  
16 I mean, he had a -- I believe he had an Otto laptop.

09:50:39

17 Q Okay. And was there like a list kept of,  
18 you know, whose laptops were whose?

19 A I'm not sure. I wasn't the one personally  
20 handling those, so I'm not sure if there was a list  
21 or not.

09:51:02

22 Q Who would have been that person?

23 MR. PATCHEN: Objection to the form.

24 THE WITNESS: The person -- sorry, the  
25 person you mean handing the laptops?

09:51:13

1 BY MR. PERLSON:

2 Q Sure.

3 A I think it was a combination -- varying  
4 based on time, I think it was either Rhian -- Rhian  
5 Morgan, I believe last name, or Colin. Don't 09:51:34  
6 remember his -- Colin S. Don't remember his last  
7 name. Sebrin (phonetic) or something like that,  
8 Selbin (phonetic).

9 And at times, I think those were the two  
10 primary people initially. And -- and there was an 09:51:55  
11 option, I believe, also for employees to purchase  
12 laptops directly as well.

13 Q What do you mean by that? Directly is --  
14 what do you mean "purchase laptops directly"?

15 A If engineers or someone needed extra 09:52:16  
16 machines for their day-to-day job at Otto just in  
17 the sake of basically being -- being able to move  
18 and make progress, we've also enabled engineers to  
19 buy those machines directly.

20 Q You understand that in this case, Waymo has 09:52:33  
21 alleged that in December 2015, Mr. Levandowski  
22 downloaded over 14,000 files to his Google laptop  
23 and then put them on a portable media device?

24 A You mean those are the allegations?

25 Q Yeah. 09:53:04

1 acquisition, and the IT folks were working on that.  
2 I don't know if it was fully fixed or not, but yes,  
3 as part of the migration, the intent of the  
4 migration was also to remove all the Otto documents  
5 to the Uber servers as well.

11:08:08

6 Q Do you know whether as part of that  
7 migration that -- whether there was any documents  
8 that were lost?

9 A I'm not aware of anything specific that was  
10 lost.

11:08:23

11 Q Okay.

12 A But I am aware there was some IT issue that  
13 the IT team has dealt with. I don't know how  
14 that -- that resulted. That was done by the Uber IT  
15 team.

11:08:35

16 Q Got it. When did -- after the acquisition  
17 closed, did people -- were the Otto employees issued  
18 Uber laptops, or did they continue to use their Otto  
19 laptops?

20 A I'm trying to recall. I don't recall for  
21 sure. There was definitely option for issued Uber  
22 laptops. I don't remember if it was an option or  
23 everyone was asked to move to Uber laptops. So  
24 actually, I don't remember the specifics.

11:09:10

25 Q When did you first discuss specific

11:09:51

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1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

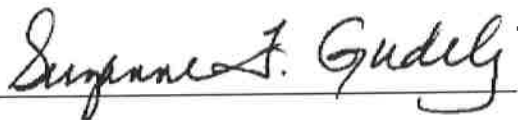
4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were duly sworn; that a record  
8 of the proceedings was made by me using machine  
9 shorthand which was thereafter transcribed under my  
10 direction; that the foregoing transcript is a true  
11 record of the testimony given.

12 Further, that if the foregoing pertains to  
13 the original transcript of a deposition in a Federal  
14 Case, before completion of the proceedings, review  
15 of the transcript [X] was [ ] was not requested.

16 I further, certify I am neither financially  
17 interested in the action nor a relative or employee  
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name.

21 Dated: June 20, 2019

22  
23 

24 SUZANNE F. GUDELJ

25 CSR No. 5111